

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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David E. Patton
Executive Director

July 2, 2021

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

BY ECF AND EMAIL

Honorable Mary Kay Vyskocil
United States District Judge
Southern District of New York
500 Pearl Street Room 2230
New York, New York 10007

USDC SDNY
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DATE FILED: 7/7/2021

Re: United States v. Navarro, et al.
S6 20 Cr. 160 (MKV)

Dear Judge Vyskocil,

I respectfully write on behalf of all defense counsel in the above-referenced matter to request an additional two weeks to file motions to suppress evidence (currently due to be filed on July 15, 2021), because we need additional time to fully review and consider the voluminous discovery prior to the filing of motions. It is the consensus of all counsel that the motions to be filed raise complex legal issues that must incorporate the information we have learned and are still learning through our review of discovery. We have spoken with the Government and they do not oppose this request.

As the Court is aware from the June 25, 2021 *ex parte* status letter submitted by Emma Greenwood, the Coordinating Discovery Attorney, the total discovery produced to date amounts to 8.4 TB of data. We received the vast majority of that discovery after September, 2020. Simply put, it has been an enormous challenge for us to digest and review that discovery, and that process remains ongoing. As the status letter notes, on June 1 and June 4, 2021, production included additional wiretap and consensual recording material. Additionally, those productions contained *Brady* disclosures important to the defense as we consider our suppression motions. Yesterday, Ms. Greenwood informed us that she would be sending us a hard drive next week containing additional discovery materials produced by the Government.

Given the total volume of the discovery, the fact that all of us are still reviewing that discovery and how it impacts our suppression motions, and the fact that our motions will raise complex legal issues, we request an additional two weeks so that we can adequately review the discovery before filing our motions.

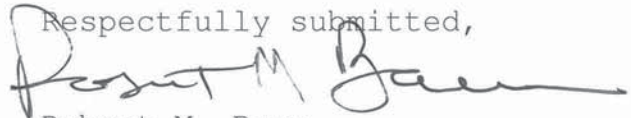
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All defense counsel have worked diligently to meet the current deadline but feel that the additional two weeks are necessary. We do not believe that this additional time will affect the Court's desire to ensure that trials proceed expeditiously.

Respectfully submitted,

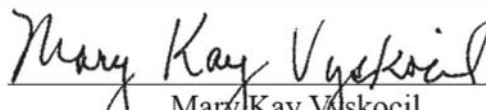


Robert M. Baum
Assistant Federal Defender
Counsel for Alexander Chan

cc: Andrew C. Adams, Esq.
Sarah Mortazavi, Esq.
Benet J. Kearney, Esq.
Counsel for the Government

The Court has reviewed both the letter filed by Defendants and the letter filed by the Government concerning discovery and the pending motion schedule. Defendants' motion for a two-week adjournment of the current schedule is **GRANTED**. Defendants' motions are due July 29, 2021. Oppositions are due September 2, 2021. Replies are due September 23, 2021. **SO ORDERED.**

Date: 7/6/2021
New York, New York



Mary Kay Vyskocil
United States District Judge